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	14			
	15	UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA		
	16	SAN FRANCISCO DIVISION		
	17	_	D 1 ( C N 10 20000 /DN)	
	18	In re:	Bankruptcy Case No. 19-30088 (DM)	
	19	PG&E CORPORATION,	Chapter 11	
	20	- and -	(Lead Case) (Jointly Administered)	
	21	PACIFIC GAS AND ELECTRIC COMPANY,	REORGANIZED DEBTORS' REPORT ON RESPONSES TO SIXTEENTH SECURITIES	
	22	Debtors.	CLAIMS OMNIBUS OBJECTION (NO LOSS CAUSATION – SECURITIES SOLD PRIOR	
	23	☐ Affects PG&E Corporation	TO THE FIRST PURPORTED "CORRECTIVE DISCLOSURE") AND	
	24	☐ Affects Pacific Gas and Electric Company	REQUEST FOR ORDER BY DEFAULT AS TO UNOPPOSED OBJECTIONS	
	25	■ Affects both Debtors	[Re: Dkt. No. 11483]	
	26	* All papers shall be filed in the Lead Case, No. 19-30088 (DM).	Resolving Objections Set for Hearing December 7, 2021 at 10:00 a.m. (Pacific Time)	
	27		December 7, 2021 at 10.00 a.m. (1 acme 1 mie)	

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# Weil, Gotshal & Manges LLP 767 Fifth Avenue New York, NY 10153-0119

### REQUEST FOR ENTRY OF ORDER BY DEFAULT

PG&E Corporation ("PG&E Corp.") and Pacific Gas and Electric Company (the "Utility"), as debtors and reorganized debtors (collectively, the "Debtors" or the "Reorganized Debtors") in the above-captioned chapter 11 cases (the "Chapter 11 Cases") hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the Second Amended Order Implementing Certain Notice and Case Management Procedures, entered on May 14, 2019 [Docket No. 1996], that the Court enter an order by default on the Reorganized Debtors' Sixteenth Securities Claims Omnibus Objection (No Loss Causation – Securities Sold Prior to the First Purported "Corrective Disclosure") [Docket No. 11483] (the "Sixteenth Securities Claims Omnibus Objection").

#### RELIEF REQUESTED IN

#### THE SIXTEENTH SECURITIES CLAIMS OMNIBUS OBJECTION

The Sixteenth Securities Claims Omnibus Objection seeks to disallow and expunge proofs of claim listed in **Exhibit 1** to the Sixteenth Securities Claims Omnibus Objection, on the grounds that the holders of those claims sold all of their positions prior to the release of any purported "corrective disclosure."

#### **NOTICE AND SERVICE**

The Reorganized Debtors filed the Notice of Hearing on Reorganized Debtors' Sixteenth Securities Claims Omnibus Objection (No Loss Causation – Securities Sold Prior to the First Purported "Corrective Disclosure") [Docket No. 11485] (the "Notice of Hearing"). The Sixteenth Securities Claims Omnibus Objection was supported by the Declaration of Justin R. Hughes in Support of Reorganized Debtors' Sixteenth Securities Claims Omnibus Objection (No Loss Causation – Securities Sold Prior to the First Purported "Corrective Disclosure") [Docket No. 11484] (the "Hughes Declaration"). The Sixteenth Securities Claims Omnibus Objection, the Notice of Hearing, and the Hughes Declaration were served as described in the Certificate of Service of Liliya Kulyk, filed on November 1, 2021 [Docket No. 11509] (the "Certificate of Service"). As further described in the Certificate of Service, on October 26, 2021, each holder of a claim listed on Exhibit 1 to the Sixteenth Securities Claims Omnibus Objection received a notice including the claim number, debtor, claim

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amount and priority, and the basis for the Reorganized Debtors' objection with respect to the applicable claim to be disallowed and expunged.

The deadline to file responses or oppositions to the Sixteenth Securities Claims Omnibus Objection has passed. The Reorganized Debtors have not received any formal or informal responses.

#### **DECLARATION OF NO OPPOSITION RECEIVED**

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

- 1. I am a partner with the law firm of Weil, Gotshal & Manges LLP ("Weil"), counsel for the Reorganized Debtors.
- 2. The Court's docket in the Chapter 11 Cases has been reviewed and Weil has determined that no responses have been filed with respect to the Sixteenth Securities Claims Omnibus Objection.

WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and expunging the proofs of claim listed in the column headed "Claim to be Disallowed/Expunged" in **Exhibit A** to this Request, which listed claims identical to those in **Exhibit 1** to the Sixteenth Securities Claims Omnibus Objection.

Dated November 30, 2021

## WEIL, GOTSHAL & MANGES LLP KELLER BENVENUTTI KIM LLP

By: /s/ Richard W. Slack

Richard W. Slack

Attorneys for Debtors and Reorganized Debtors

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